

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF THE NEW
YORK TIMES COMPANY IN THE
MATTER OF UNITED STATES OF
AMERICA v. CHRISTOPHER WADE

No. 24 MC ____

HON PAUL G. GARDEPHE

DECLARATION OF DAVID MCCRAW

I, David McCraw, hereby declare under penalty of perjury as follows:

1. I am Deputy General Counsel at The New York Times Company (“The Times”). I submit this declaration to set out The Times’s actions thus far and to submit into the record material in support of The Times’s motion to unseal in a criminal case captioned *United States v. Christopher Wade*, filed in the Southern District of New York.

2. On December 23, 2020, former President Donald J. Trump granted “a full and unconditional pardon” of Christopher Michael Wade “[f]or his conviction in the United States District Court for the Southern District of New York in sealed Docket No. 06-cr-594; the offenses of conviction and sentence are also under seal.”

3. Attached as **Exhibit A** is a true and correct copy of President Trump’s full pardon of Mr. Wade, available at <https://bit.ly/48K7qyE>.

4. Attached as **Exhibit B** is a true and correct copy of a December 23, 2020 White House press release titled “Statement from the Press Secretary Regarding Executive Grants of Clemency,” available at <https://bit.ly/3UhyUY9>.

5. As reflected in President Trump's pardon, Mr. Wade's docket remains fully under seal, including the name of the judge assigned to the case. Entering the case number on ECF results in no information other than a notice that the case is sealed.

6. On January 17, 2024, The Times sent a letter to Chief Judge Swain seeking her assistance identifying the judge in Mr. Wade's case so that The Times could appropriately direct a motion to unseal to the judge who had overseen the matter.

7. On January 23, 2024, in response to The Times's letter, the Clerk's Office notified The Times by phone that it could pursue unsealing by filing a miscellaneous action and that The Times's motion would be heard by Judge Gardephe of this Court.

Dated: January 26, 2024

Respectfully submitted,

By: /s/ David McCraw
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